

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada
Nevada Bar No. 2137
3 MARLA K. LETELLIER
Special Assistant United States Attorney
4 California Bar No. 234969
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Tel: (415) 977-8928
6 Fax: (415) 744-0134
Email: Marla.Letellier@ssa.gov
7 Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LOREN F. GRAVES,

Plaintiff,

V.

CAROLYN W. COLVIN,

Acting Commissioner of Social Security,

Defendant.

Case No.: 2:15-cv-00106-RFB-NJK

UNOPPOSED MOTION FOR EXTENSION OF TIME
(First Request by Defendant)

COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla K. Letellier, Special Assistant United States Attorney, to request that this Court extend the time to respond to Plaintiff's Motion for Remand, which was filed on June 8, 2015 by 30 days from July 13, 2015 to August 12, 2015. This is Defendant's first request for an extension of time to respond to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on July 9, 2015, and Plaintiff does not oppose Defendant's motion. Defendants' current deadline is July 13, 2015.

The instant request is not intended to cause delay and is necessary because of the heavy workload of counsel for Defendant. For example, Counsel is responsible for briefing dispositive

1 motions in 10 different federal court cases between July 8, 2015 and July 30, 2015, as well as other
2 agency matters. Additionally, Counsel will be out of the office for 5 days over the second half of July
3 due to family obligations.

4 Defendant therefore respectfully requests a thirty (30) day extension of time to respond to
5 Plaintiff's motion, up to and including August 12, 2015.

6 Dated: July 9, 2015.

7 Respectfully submitted

8 DANIEL G. BOGDEN
9 United States Attorney

10 */s/ Marla K. Letellier*
11 MARLA K. LETELLIER
12 Special Assistant United States Attorney

13 OF COUNSEL:

14 DONNA L. CALVERT
15 Acting Regional Chief Counsel

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: July 10, 2015